

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**MARYANN BUTLER and  
AUDURY PETIE DAVIS,  
Plaintiffs,**

**v.**

**NEW AMERICAN FUNDING (BROKER SOLUTIONS, INC.),  
Defendant.**

**Case No.: 1:25-cv-690-PJC  
Judge: Hon. Phillip J. Caraballo**

**FILED  
HARRISBURG, PA**

**JUL 14 2025**

PER  **DEPUTY CLERK**

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**EMERGENCY JUDICIAL NOTICE  
OF IMMINENT THIRD-PARTY HARM AND REQUEST FOR RESPONSE ORDER**

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NOW COME the Plaintiffs, Maryann Butler and Audury Petie Davis, in good faith and pursuant to this Court's July 11, 2025 Order, to respectfully file this Emergency Judicial Notice regarding newly materialized, imminent third-party harm stemming from the Defendant's prior conduct and inaction.

This filing is submitted following the Plaintiffs' curative correction of standing through a Verified Complaint, with both parties now joined to preserve the record and comply with Fed. R. Civ. P. 17(a)(3).

Plaintiffs affirm that all filings previously struck by the Court (Docs. 3, 5, 7-10, 12, 15, 18, 20-23, 25-26, 28-29, 32-33, 35-36) were removed without prejudice solely due to a procedural standing issue, not based on substance.

These entries include judicial exhibits (A through Z), an MP3 audio file submitted via USB drive, sworn affidavits, motions, and filings concerning verifiable harm arising from an abandoned FHA refinance.

Since the Court's order, Plaintiffs continue to experience urgent third-party legal pressure in the form of collection threats, contractual fallout, and financing denials all directly traceable to the Defendant's previously documented misconduct.

Plaintiffs respectfully request that the Court issue a brief response order directing Defendant to respond to the operative record within seventy-two (72) hours, in light of time-sensitive, escalating harm now compounding in real time.

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### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request the following:

1. That the Court take judicial notice of all prior filings struck without prejudice and permit reference to such materials as incorporated by the Verified Curative Complaint;
2. That the Court issue a short order requiring Defendant to respond to the operative record within three (3) days of this filing, due to imminent third-party harm;
3. That any additional relief be granted as this Court deems just, equitable, or appropriate to prevent further irreparable harm.

Respectfully submitted,

Dated: July 14, 2025

/s/ Audury Petie Davis   
Audury Petie Davis  
Co-Plaintiff & Authorized Representative  
2041 Greenwood Street  
Harrisburg, PA 17104  
Phone: (717) 424-8220  
Email: mfmallah87@icloud.com

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### **VERIFICATION**

I, Audury Petie Davis, hereby verify under penalty of perjury that the facts stated in the foregoing notice are true and correct to the best of my knowledge and belief.

Executed on this 14th day of July, 2025.

/s/ Audury Petie Davis  
Audury Petie Davis\*\* 

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Emergency Judicial Notice was served via email on July 14, 2025, to:

James McNally, Esq.

Email: [jmcnally@cohenseglia.com](mailto:jmcnally@cohenseglia.com)

/s/ Audury Petie Davis

Audury Petie Davis